

WIA May 2005 Draft Wisconsin State Plan: Verbatim Public Review and Comments

Dave Wilson, Private Industry Council of Milwaukee County, Inc.

"Collaboration to Overcome Barriers, it mentions the Milwaukee Interchange Project. It should be the Marquette Interchange Project. "

Mary Witt, Job Service

Page 20: V.A. Leveraging Resources:

First sentence in first paragraph needs editing. It takes up six lines. Looks like it contains remnants of previous efforts.

In the second bulleted item of this section, the same sentence is repeated twice.

(Begins with "In addition to state and federal agency-developed information")

Page 53: Second paragraph from bottom: The "is" in the third line down about Job Service staff doesn't work. Suggest restructuring the sentence.

Jody Owens, Employment Connections

VII. E. Full Spectrum of Assets

To address the goals of the Governor's *Grow Wisconsin* initiative, a high level *WDA Plan* must be developed that identifies the workforce and economic needs of the area. Within the planning process each WDB will account for regional economic initiatives, business trends, worker skill/sector-based training needs and efforts planned to address them. WDBs will be expected to ramp-up business services to focus on employers that offer entry level jobs that pay good wages. Core and specialized business services should be available. Services to job seekers will focus on building career resiliency over a lifetime of work. Job Seeker services will include a new emphasis on understanding the labor market in which they are seeking employment, choosing employers that offer good wages and opportunities for advancement, how to repair credit and build financial assets.

Can "credit repair" be changed to "credit rehabilitation"? "Credit Repair" is an industry term which is associated with illegal activities.

Nanette Vetsch, District Supervisor, Job Service

Section I.B. (p.6) - DWD is exploring the concept of "workforce intermediaries" - alternative entities that can enhance demand driven goal of closer connect the business. *Is the intent here for DWD to explore direct service contract with non-partner agencies (staffing agencies, head-hunters, out-placement firms) for the delivery of services? Are PLX services on the table here as well?*

Section II (p.9-10) - Key Strategic Priorities - Focus PLX services on employers with

- family supporting wages
- reasonably priced health insurance
- promotion-from-within policies
- career ladders
- employer-sponsored training

- tuition reimbursement
- 401Ks
- lower turnover
- apparent financial solvency

While this is certainly admirable and in keeping with more focus on which businesses we work with, what will be the source of data on some of these factors? Would we use the Boston College data for sustainable wages? Do we count a 403B the same as a 401K (of course)? How would apparent financial solvency be determined?

Section VI.B - Minimum Job Center Requirements to receive DWD Resources....At what point would an evaluation of the current centers be completed to determine which locations would no longer receive DWD support (T-1 lines, JobNet machines, printers, etc.)?

Section VIII.H.1. - At the local level, Job Service will compete for WIA funding and be an integral part of providing WIA and WP labor exchange services. Does this mean Job Service will have to compete for WP funds? Does this mean that DWD will approve positions authority when Job Service competes for and wins contracts? Does this mean that every WDB must consider Job Service as a possible contactor by issuing an RFP for services?

VIII.K.1. - No WDBs are currently providing direct services as defined by policy. I sure would like to get a look at the specific policy language. What is happening is West Central is not a clear separation of the legal entity created by the WDB to provide services when the same individual directs both the WDB and the provider agency.

IX.A.3. - Comprehensive Job Center Requirements (p. 47-48) When will the determination be made on each center, and who will make the determination? If the decision is left to the WDBs, my guess is that DWD resources will continue to filter to numerous locations that do not meet the definition provided in this section.

I.X.A.4. - Tools and Products - DWD supplies....customer brochures. While DWD supplies these, as well as things like expensive ink cartridges for Resource Room computers, it is primarily Job Service that pays for them. Is there an intent that these costs also be shared among partners?

IX.B.3. - Silver Platter Website Access - Mental Measurements Yearbook. This is the first mention I have ever seen of this website. Where did this come from, and does it have any bearing on what assessment and testing instruments can be used within Job Center and among partners? How does this relate to the testing and assessment requirements that are often tied to job orders on WJOS?

Nancy Bryan, Performance Policy

Replace 1st paragraph under X.D.7.:

U.S. DOL released TEGL 28-04 on April 15, 2005. DWS staff are assessing the impact of the new common measures requirements on the state's reporting system and projected performance outcomes. The late publication of these reporting requirements gives us less than 90 days to make the necessary adjustments and resources are scarce this late in the program year. Fortunately, DWS had the foresight to anticipate many of the principles addressed by the implementation of common performance measures, so the impact on WIA Title 1 and TAA reporting is manageable. Title 3 will be more complex because of the network of data entry systems that bring registration information into the participant reporting system.

Joe Gilles, Council on Workforce Investment; Co-Chair of Workforce System Development Committee

Here are some thoughts relative to the WIA plan...I did read all 140+ pages, although my mind may have wandered a few times. I found it very different than what I would normally see as a strategic or tactical plan, most that I see have more focus, usually covering distinct sections like:

- the environment

- the needs

- the alternatives (including competitive solutions)

- the proposed plan of action

- a clear schedule of due dates for action

this seemed to repeat itself occasionally, and had little in the way of action plans with due dates.

having said that, it is probably fine for use with the DOL...it is a good comprehensive outline of things going on... it may be exactly what they are use to receiving

wondered why we haven't met the LPLs listed on page 41...they should have presented to us long ago

didn't even know we had an EEO Officer connected to the WDBs

didn't know a lot of other things

Didn't know that CWI was the genesis of the interagency team....again...they should report their progress to us sometime

not sure I understand the 35% alloc rules (shows up occasionally, see p 30)

wondered about paragraph VIB#3 p 30....

page 33 says we have no plans to change the WDA's.....I thought that was a possibility....make them more economic

not much in here relative to education (universities or tech colleges)

Jerry Hanoski, Director, Western Wisconsin WDA

On behalf of the Western Wisconsin Workforce Development Board, we have the following comments to make regarding the State of Wisconsin's draft WIA plan.

Job Service:

The state's WIA plan makes several references to the role of Job Service both as the presumptive lead in resource area for Job Centers and as having requisite staffing in order to qualify Job Centers to be recognized as comprehensive centers.

- Job Service has entered into a locally-based business planning process. We think it premature, if not inappropriate, for the State WIA plan to presume what will come of the business planning process and the ensuing roles of Job Service throughout the state. Therefore, we recommend the WIA state plan recognize that planning process and the role of Job Service then be defined as a result.
- The ongoing decline of Job Service Wagner-Peyser staff is troublesome not only to Job Service being able to carry out its functions, but to the ongoing participation in Job Centers. There are many Job Centers function effectively with considerable staffing and without Job Service staff, albeit most, if not all have JobNet. Additionally, the allocation of Job Service staff throughout the state is uneven. In some areas, the staff are concentrated in one location while there are several Job Centers in surrounding counties. The requisite for physical presence of Job Service staff in order to be classified as a comprehensive Job Center should be removed.

35% training spending requirement on high demand occupations

While we understand the concept there are some difficulties in attaining this objective.

- WIA is required to first take into account other financial aids available to customers; very often other financial aids can cover tuition and WIA resultantly often provides support costs (vs. training costs) necessary for customers to enter and stay in training. If the state wants its WIA plan to have a percentage of costs targeted to customers in high demand occupations, it ought not limit the line to training and include support and other associated costs necessary to get customers into high demand occupational training.
- A second issue is waiting lists. Health occupations are among those in high demand; consequently, they are also in demand with enrollment waiting lists in some occupations of up to two years or more. One method WDBs can respond to the waiting lists in high demand occupations is by bringing in private providers or incurring extra ordinarily higher expenses by creating new training sections at local technical colleges. We recommend such a requirement take into consideration the aforementioned conditions. An alternative condition might be for WDBs to demonstrate intent to achieve this goal while also reporting back to DWD obstacles.

Dislocated worker earnings change

- In adding the absolute earnings change of \$(1,353) in PY2005 and \$(1,253) in PY2006, earning power differential across the state needs to be taken into account. Average earnings in Western Wisconsin, for example, are 84% of the state average. It would not be equitable to apply the same absolute standard to every WDA.

Terri A. Johnson, Wisconsin State AFL-CIO/Labor, Education and Training Center Director and Coordinators

The draft WIA State Plan has been reviewed by the Wisconsin State AFL-CIO/Labor, Education and Training Center Director and Coordinators. Although Apprenticeships are mentioned, they do not seem to be stressed to the degree of importance we feel they should be. If Health Care can be targeted as one of the "35%" training opportunities, why can't there be standards/requirements set to promote the development of apprenticeships in demand occupations within a minimum percent similar to health care?

Richard Best, Executive Director, West Central Wisconsin WDA

Regarding the use of the term "High Wage - High Growth" occupations and similar philosophies - I would suggest the use of High Wage - High Demand in its place. The stipulation that efforts be focused on high growth as opposed to high demand leaves out many high paying opportunities that will become available due to the large anticipated aging out of the workforce in many skilled trades and professional occupational sectors. The vacancies that will occur present many opportunities for job seekers, even though these may not be high growth areas. It would be unfair both to the individuals as well as the industries effected to not show high priority for such opportunities.

Additionally, it should be recognized that many individuals who are faced with barriers may need to start their climb to high demand, high wage occupations at an entry level area and efforts to assist these individuals through initial "career ladder" - "career lattice" strategies should be recognized. I would suggest that assistance that shows a clear pathway to higher wages and demand occupations be fostered. Failure to do so may result in those most in need being underserved in an effort to achieve high-wage, high demand standards. Documentation of the "pathways" to higher wages and demand occupations should be required and such efforts encouraged.

Requiring a specific percentage to be spent on training in specific occupational areas is also of questionable merit. While I support the intent of targeting assistance to those areas, such requirements fail to address the needs of barriered individuals to receive developmental training which may put them on the path to higher wages and demand occupations, but the training itself may not show up in that category and may result in under service to such populations. Secondly, Support Services and other strategies are often applied to assist individuals in maintaining themselves in training and additionally, training cost may be covered by other sources. It should be the enrollment in "paths to high wage, high demand occupational training areas" that is the goal, not the specific expenditure of funds that should be emphasized. We have received the endorsement of training providers in our region to reallocate funds to support services away from training in order to assist individuals who may have access to training assistance from other

sources. This should be left as an area of local discretion with the requirement for Workforce Development Areas to address what it is they propose to do to support "high wage-high demand initiatives". This will result in greater innovation than the degree of specificity included in the text of the current plan.

I would strongly recommend integration of the efforts of the Governor's Work-based Learning Board and the State Council on Workforce Investment.

I believe that it is a mis-statement in Section VII K.3. to state that local boards created separate entities to provide services. It is clear that there are separate entities in some areas that provide services, but they were not generally created by the WDB's - they were created in some cases in advance of the existence of WDB's and in others as independent entities. WDB' s didn't "create" these entities.

I would support greater integration of WIA Dislocated Worker and TAA services. The current limits on DWD staff and TAA assistance has caused many bottle necks for service access. Greater integration of TAA process with WIA process would streamline service delivery and could be accomplished without a direct transfer of funds.

The requirement that Wagner-Peyser staff must be present in a Job Center Resource room for a Job Center to be designated as Comprehensive is ill-conceived in today's budgetary climate. With staffing freezes in DWD and the high rate of retirements that have and will continue to occur within the department, this places WDA Job Center strategies at the mercies of individual personnel and retirement decisions. Areas have no control over the availability of Wagner Peyser staff and should not be penalized for the decisions made by such individuals or by the policy decisions of the department that prevents positions from being filled. Our region currently has had to compensate for such decisions and will continue to due so. We should not be further penalized because of such decisions. This is far from a strategic approach to the design and delivery of services.

It would be highly appropriate to include in the plan that Veterans Service and DVR staff can provide core services in Job Center Resource Rooms as many participants using these services are individuals with disabilities and veterans. It is inappropriate to exclude these resources from the mainstream of Job Center service provision.

Thank you for this opportunity to comment on the state plan. I am sorry time does not allow for a more thorough review while still meeting the stated deadline for submission.

Peggy Laska

Just some input, I have a Masters in Mgmt. and Organizational Behavior, and completed three college degrees in the three levels of college education within a 9-year period. I started at age 44 on this path. It is hard to find employment at age 62. Seems only Wal-Mart wants that age.

You have in place laws that employers use as criteria by which they hire; I call them the "avoidance theory" of employing people. Look to the laws that employers try to avoid when they employ: 40-hour work week laws, unemployment compensation and its taxes, workman's comp., and others. The current structure of these laws PREVENT people from being hired, rather than assist them. Also, employers seem to have eliminated lunch hours, breaks and make people work 12-hour shifts--this is what stresses out workers. The drugs, crime and peripheral results of crime, are as result of

not having fair employment. A JOB is critical to this society's ills, a job where you are treated like a human. Where are those laws? I know it is hard to move a dinosaur, but it can be done. Keep this in mind when TRYING TO HELP PEOPLE GET EMPLOYMENT.

Scott Durren, State Independent Living Council and for the Governor's Council on Physical Disabilities

On behalf of the State Independent Living Council and Governor's Council on Physical Disabilities, please accept our thanks for the opportunity to provide feedback on the draft WIA state plan.

Demand-driven implementation is a significant step forward. Gathering over 300 surveys and holding 16 statewide listening sessions in developing Wisconsin's State Plan for Independent Living (SPIL), employment was identified as a significant barrier to independent living. The Council on Physical Disabilities also develops a state plan and has similar concerns.

The Councils agree in developing a qualified workforce that can perform essential job functions. This philosophy is consistent with the Governor's initiative to invest in qualified workers for quality jobs. (p. 92) First, we believe it is important to support two significant implementation themes—investing in people and accomplishing outcomes through partnerships.(p.5) The bulk of our comments center around the aforementioned proposed strategies and offer methods to strengthen the plan. In a tight funding environment, demonstrating practical methods to improving communication, collaboration and coordination is essential.

People with disabilities have been identified as a target population. Interesting, this population is a target population for receiving services as well as a population to develop employment opportunities. The plan proposes to use "high end business" to create training. (p.7) Wisconsin also has a cohesive network of Independent Living Centers that take pride in their ability to analyze and create training that fits an organization. Their unique abilities allow them to work with a person with a disability to develop individual skills or an employer to locate proper and effective assistive technology. In addition, this is a linkage already established through the job center assessment process. Thus, ILC staff is familiar with job center services and can suggest independent living strategies that lead to successful outcomes.

Councils agree that increasing funding for technology training and involving key stakeholders will lead to better outcomes. The ILC network has extensive experience with assistive technology. Each ILC has a "loan closet" that has an array of items that may be used to simplify or accomplish tasks. This type of service should be used in conjunction with the "accessible work stations" available to some job centers. The coordinated use of these resources is not only cost-effective but allows for full statewide coverage.

Integrating key community stakeholders is a critical component. Governor appointed councils have statewide geographic representation, and ILC's have a pulse on their local community needs and resources. These are two stakeholders that can have a dramatic impact on effective design and feedback. These partners have a significant impact when discussing industry priorities such as the health care worker shortage. If training is a priority, and decreasing potential injuries is a focus, these stakeholders can identify

ways that are practical, influence curriculum design and lead to better skill development. A “no lift” demonstration isn’t necessarily the answer to decreasing potential injuries. If individuals are not properly trained on a device, their ability to move or adjust an individual may also lead to an injury. The same circumstances may happen if individuals are not properly trained on how to move an individual.

Establishing a committee that is comprised of interagency personnel is noble, but collaborating and communicating is the key. The Councils believe this is a significant step. The proposed plan relies heavily of interagency relationships with the Departments of Public Instruction, Commerce and broad discussion that include other government agencies. There is also discussion about a subcommittee that is innovative surrounding the Medicaid Infrastructure Grant (MIG). These are all positive steps. However, the Councils agree with the statement that membership composition leads to better vision implementation. (p. 13) To that end, people with disabilities need to be represented at the table during these significant policy discussions. It may sound insignificant to some, but it has already proven successful in Wisconsin. In discussions with WETAP, a simple line was added in the request for proposal that mandated people with disabilities be involved in the planning process. That minor sentence led to a systems change that increased collaboration, combined resources, identified better methods for community inclusion and has made a significant impact on transportation in northwest Wisconsin. People with disabilities have been identified as a priority population (p. 20), but there doesn’t appear to be representation on the Council for Workforce Investment (CWI). (p.95-96)

Incorporating people with disabilities in the policy discussions will make a difference in systems change. Many of the described information sharing methods or outreach considerations are traditional approaches. (p. 17) Some of those methods may work, many will not work when conducting outreach to people with disabilities. Lack of technology, transportation, effective communication all influences how individuals with disabilities may access the employment system. Whether on the employment side, or service delivery side, the top 15 areas for employer demand, job skill development affect people with disabilities. (p. 19) Coordinating to develop grant initiatives, affect industry priorities and invest in people’s outcomes will be better if stakeholders are involved to meet demand.

Finally, if the plan is consistent in its population priorities, please include people with disabilities in the objectives. (p. 93, Objective B) There are some areas to increase coordination and collaboration (Objective E) that will maximize resources (Objective F). Those areas include:

1. Implementing recommendations from the Olmstead planning grant: A Department of Labor grant that conducted a gap analysis affecting potential community integration and employment barriers to people with disabilities. The report was a result of analyzing gaps in the employment and long-term care systems. These recommendations should be analyzed to identify what budget-neutral strategies may be implemented.
2. Analyze coordination of job center, aging and disability resource center, and ILC network: Increase the potential for a true one-stop system that involves public/private partnership and the potential to address most needs in one setting will increase participation by people with disabilities. This increase in communication also has potential to affect outreach and improve funding options.

3. Collaborate with the Department of Health and Family Services on comprehensive systems change outcomes: Many initiatives, such as the health care worker shortage are being addressed by the Long Term Care Council. DHFS received a \$5.5 million dollar grant to conduct re-design and systems change. Projects such as "Homecoming" (transition from nursing homes to community integration) have resulted in employment placements. These efforts need to be coordinated to decrease duplicate efforts.
4. Youth initiatives need to be coordinated: Schools, the independent living community and state agencies need to coordinate better so that education truly leads to career advancing opportunities. Most youth activities are in job centers (p. 47), but outreach initiatives must include youth transition activities. Issues such as transportation, housing, benefits and long-term care affect decisions such as college choices, employment options and improved post-education outcomes (p.71).
5. Put disability navigators out of business: The goal should be to have a system that is seamless and doesn't present a need for disability navigators. To be sure, the navigators are successful in Wisconsin, but do not meet the need. Eleven navigators provide a plug to some gaps, but the system needs to be developed that ensures opportunities are afforded so that navigators aren't necessary to help one weave through the system(s). Having people with disabilities at the table for design is one way to affect this systems change.

Again, thank you for the opportunity to partner on this important topic. Please feel free to contact me if we can provide any further assistance.

Anonymous

Note: Because of the sensitive nature of the topic below, I am submitting this comment anonymously so that the focus will be on the content rather than the sender. Would hope that it will be included in the comments.

WDB Boards and Direct Service Provision (Page 43): Consistent with the legislation, Wisconsin's draft WIA plan prohibits from providing direct services or functioning as OSOs unless approved by the Governor. (Such approval requires conclusively proving that there are no other organizations available, interested or qualified to provide these services.) At the same time, the draft is silent on the concurrent establishment (in some parts of the state) of the noticeable and singular entity (one per WDA) created to carry out these functions "legally" as a recipient of WDB funds.

Each of these entities is managed by a person who has long been the board's Executive Director. In some cases, that individual continues wearing both hats as a paid employee of both the board and the other entity. In other cases, may not technically be on both payrolls, but remains in a leadership role with the Board not as regular member, but with special status and authority (such as having WDB fiduciary responsibilities). Additionally, these entities are often staffed by non-managerial personnel who have either been employees of the board until transfer to the new entity, or who seem to be employed by both entities (the board and the service providing entity).

Although the creation of these organizations may satisfy certain technicalities identified by legal experts as sufficient protections against claims of conflict of interest or procurement violations, most lay persons (including board members and service providers) see little or no real separation between the WDB, these entities, and their

leadership. and related correspondence carried on the Internet underline the closely intertwined relationships between these entities and the boards, and even reference their creation as a means of complying with WIA policy.

From a public policy point of view, treating these organizations as nonexistent (or their WDB relationships as appropriate) seems contrary to the intent of the WIA and potentially embarrassing to the state. They allow the members of boards to fund a surrogate organization with the implicit approval of board managers who also benefit directly as managers of the receiving entity. Under these circumstances, the procurement process is undermined and a WDB loses (or never acquires) a reputation for providing impartial oversight of their local One Stop system.

A better approach would be to recognize the need for establishing DWD policies that prohibit the practices described above. If it is within the purview of our agency should also set policy requiring a reasonable, specified period of time to elapse before a paid manager of any WDB can be the recipient of WDB funds for direct service provision, either as an independent contractor or as the head of a separate entity.

Mary Witt, Job Service

My comments are shown below. . . . Plus, I want to add that having reviewed some of the draft plans from other states (i.e., via the Internet), I really appreciate the treatment of the One Stop partnership as a whole and Job Service in particular in our state's plan.

COMMENTS:

ES (Job Service) Collocation/Integration: A big emphasis nationwide is getting the Employment Service (i.e., Job Service) collocated with One Stop Centers(!) Perhaps it's already noted and I've missed it, but I recommend checking the document to make sure that it's clear to the feds and other readers that as a core partner, Wisconsin Job Service has long had its operations collocated with One Stop Centers and will continue to work collaboratively, physically housed at these multi-agency service sites.

Pages 30 (Administrative Resources); 32 (Job Center System Infrastructure Costs) and 46 - 47 (Job Center/Satellite Center Requirements) :

- Recommend language communicating the expectation that WDAs/Job Centers will use exclusively the statewide DWD-approved IT reporting/information brokering systems (AJB, ERS/WJOS, JobNet, ASSET) and investing in duplicative systems and requiring staff to use them will be a disqualifying practice. (*Rationale: Duplication is costly; a serious impediment to the flow of information required federally, and detrimental to multi-agency partnerships.*)
- *On the other hand, some have invested in these systems as the result of frustration over perceived inadequacies in state-sponsored systems.* Therefore, also recommended language here (and elsewhere in the document as appropriate) communicating that DWD/DWS is committed to the development and continuous improvement of reporting/information brokering systems not only to keep pace with federal requirements but, equally important, to provide customers, direct services staff, and managers with state-of-the-art tools.

Page 55: Public Labor Exchange Staff Assisted Services For Business:

Recommend replacing the two paragraphs shown with a summary of the emphases contained in our Job Service Operations Plan. This would provide the specificity lacking in the existing material.

Page 61: Second line from top should read "Job Service" staff (instead of Employment Service staff).

Page 73 (Integration of Business Services and W-P): Needs to be a stronger relationship between the title of this section and its content. Recommend including a paragraph on the Job Service Operations Plan, its collaboration and demand-driven emphases (including the Grow Wisconsin connection), and its value as a compliment to/point of departure for WDB local plans. Also recommend referencing the work done on enhancing a ERS/WJOS as a Wagner-Peyser based systems feature that, when implemented in October 2005, will help with integration.

Page 74 (Innovative Service Delivery): Recommend adding the Job Service Operations Plan as an innovative strategies